

EXHIBIT 4

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

)
WAYMO LLC,)
)
Plaintiff,)
)
vs.) Case No.
) 3:17-cv-00939-WHA
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
)
Defendants.)

OUTSIDE ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF TIM WILLIS
San Francisco, California
Thursday, March 23, 2017
Volume I

Reported by: SUZANNE F. GUDELJ
CSR No. 5111
Job No. 2576518
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1 but that's if -- assuming that you're networked,
2 right?

3 MS. BAILEY: Object to form.

4 THE WITNESS: During that period, I'm not
5 aware of him not having access to the network. 11:24:10

6 BY MR. MUINO:

7 Q And what if he's reading documents away
8 from the office?

9 A He could WiFi at home.

10 Q Have you exported documents to your 11:24:22
11 devices?

12 A Yes, I have.

13 Q How frequently do you export documents to
14 your devices for your work?

15 A Not frequently. Rarely. 11:24:38

16 Q But you've done it before?

17 A Yes.

18 Q And why did you do it on those occasions?

19 A If I needed to communicate with a supplier,
20 maybe a contract where I'm revising it; or they're 11:24:47

21 sending me a presentation, but I don't have to
22 download -- I mean, it's downloaded from email, but

23 only if I -- typically only if I'm exchanging with

24 the supplier information. Red line documents, those

25 type of things that somebody needs to use, Excel or 11:25:06



25

Q They presumably have their own websites?

12:30:13

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1 A Yes.

2 Q They're not exclusive to Google Waymo?

3 A No.

13 Q Looking at this list, do you know if Uber
14 uses some or all of these vendors?

15 A I wouldn't know. 12:31:12

16 Q Have you ever spoken with any vendor about
17 its doing business with Uber?

18 A Yes.

19 Q And on what occasion --

20 A A vendor approached me -- 12:31:24

21 Q -- was that?

[REDACTED] to let me know that they were
23 planning on -- or that Uber had reached out to them
24 to do business with them.

25 Q When did that occur? 12:31:37

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1 BY MR. MUINO:

2 Q In your experience, do Google employees,
3 former Google employees, after they leave the
4 company, ever get consulted in connection with their
5 work? Is there any follow-up to ask them questions 12:59:55
6 pertinent to their former work?

7 MS. BAILEY: Object to form.

8 THE WITNESS: Not that I'm aware of.

9 BY MR. MUINO:

10 Q Do you know if after Mr. Kshirsagar left, 01:00:07
11 anyone contacted him to ask him questions about his
12 prior work?

13 A I never reached out to him, no.

14 Q How about Mr. Raduta?

15 A I never reached out to him. 01:00:18

16 Q Now, you don't have any information that
17 Uber is using any of Waymo or Google's trade
18 secrets, do you?

19 MS. BAILEY: Object to form.

20 THE WITNESS: No. 01:00:41

21 BY MR. MUINO:

22 Q And you may be aware there's an allegation
23 that 14,000, approximately, documents were
24 misappropriated. That's an allegation in this case.
25 You don't have any information that Uber is using 01:00:58

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

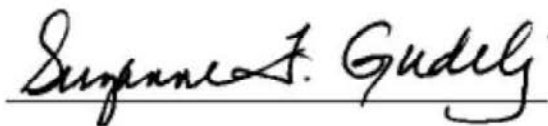
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [X] was not requested.

16 I further, certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: 3/24/17

22 
23

SUZANNE F. GUDELJ

24 CSR No. 5111
25